

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

**UNITED STATES OF AMERICA,**

**v.**

**Criminal Action No. 1:22-CR-51-3  
(Chief Judge Kleeh)**

**SEAN MCKINNON,**

**Defendant.**

**UNOPPOSED MOTION FOR COMBINED  
CHANGE-OF-PLEA AND SENTENCING HEARING**

Now comes the United States of America by William Ihlenfeld, United States Attorney for the Northern District of West Virginia, and by Brandon S. Flower, Assistant United States Attorney, who moves the Court to schedule a combined change-of-plea and sentencing hearing. The United States proffers the following in support of this motion:

1. On December 6, 2022, a grand jury returned a five-count Superseding Indictment charging the defendant in Count One with Conspiracy to Commit First Degree Murder, in violation of 18 U.S.C. § 1117; and in Count Five with False Statement to Federal Agent, in violation of 18 U.S.C. § 1001(a)(2).

2. The defendant and counsel have executed a binding plea agreement pursuant to Federal Rule of Criminal Procedure 11(c)(1)(C). The parties seek a combined plea and sentencing hearing. Further, the parties have agreed to waive their right to a full presentence investigation report in advance of sentencing. However, the parties agree to cooperate with the United States Probation Office in the preparation of a modified presentence investigation report.

3. The United States has conferred with the defendant's counsel, who does not oppose this motion.

Accordingly, the United States respectfully requests the Court to schedule a combined change-of-plea and sentencing hearing.

Respectfully submitted,

WILLIAM IHLENFELD  
UNITED STATES ATTORNEY

By: /s/ Brandon S. Flower  
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**CERTIFICATE OF SERVICE**

I, Brandon S. Flower, Assistant United States Attorney for the Northern District of West Virginia, certify that, on May 13, 2024, I electronically filed the foregoing **UNOPPOSED MOTION FOR COMBINED CHANGE-OF-PLEA AND SENTENCING HEARING** with the Clerk of the Court using the CM/ECF system, which will send a copy of the filing to counsel of record by electronic means.

WILLIAM IHLENFELD  
UNITED STATES ATTORNEY

By: /s/ Brandon S. Flower  
Brandon S. Flower, WVSB #9338  
Assistant United States Attorney